

UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF TEXAS

SAN ANTONIO DIVISION

THE UNITED STATES OF AMERICA

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\*

Vs.

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CAUSE NO. SA-10-CR-00536-FB

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RICHARD BROOKS, CASEY VAUGHAN

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**MOTION REQUESTING TRAVEL**

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES, CASEY VAUGHAN, defendant, and moves this Court to allow him time to travel and would show the following:

I.

Defendant's sentencing is currently due on October 24, 2013.

II.

Defendant prays that this Court allow him to leave the jurisdiction of the Western District of Texas for 11 days. Defendant has a job interview in New York City, New York, scheduled possibly for August 8, 9, or 14, 2013. If the interviews go well, and he is hired, this job would allow him to work from home. The employer would be a subsidiary of AIG, an insurance giant.

He was to have had this interview in Houston, Texas, on June 28, 2013, however, he was unavoidably detained by the U. S. Marshall's service. He has always acknowledged that the 10 days of incarceration were entirely due to his own conduct. He takes full responsibility for setting in motion the conditions which led to his imprisonment. He was able to reschedule this interview.

Mr. Vaughan's medical insurance from his previous employment is about to expire. Mr. Vaughan seeks the Court's permission to allow him to travel to New York City, New York, so that he might obtain gainful employment. The medical benefits alone make the employment desirable. He fully intends to pay any and all costs assessed in his case. He asks only that he be allowed to be gainfully employed in an area of his expertise and within the confines imposed upon him by his medical condition.

The United States Attorney is aware of this motion requesting time to travel.

THEREFORE, PREMISES CONSIDERED, DEFENDANT REQUESTS THE COURT TO CONSIDER AND GRANT THIS MOTION.

Sincerely,

/S/ Bertram Oliver Wood III

Bertram Oliver Wood III

TBN 21884450

Attorney for Defendant

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Certificate of Service

This certifies that a true and correct copy of the foregoing motion has been e-mailed/hand-delivered/faxed/and/or mailed, certified mail, return receipt requested, to the United States Attorney, 601 N. W. Loop 410, Suite 600, San Antonio, Bexar County, Texas, 78228, on the 10th day of July, 2013.

/S/ Bertram Oliver Wood III

Bertram Oliver Wood III

UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF TEXAS

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RICHARD BROOKS (1)

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CASEY VAUGHAN

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**ORDER**

On the \_\_\_\_\_ day of July, 2013, came on to be heard Defendant Casey Vaughan's motion for time to travel. Having considered the evidence it is the ruling of the Court that the Motion should be

GRANTED/DENIED.

IT IS THEREFORE ORDERED that the Defendant be allowed to travel outside the jurisdiction of the Western District of Texas from August 5th to August 16, 2013.

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CHIEF JUDGE FRED BIERY